



SDMS DocID

2075233



Office of the General Counsel  
and Secretary to the Board of Trustees

203 Wilson Hall  
Rochester, Michigan 48309-4401  
(248) 370-3112 Fax: (248) 370-4474

August 24, 2005

**Via Facsimile and First Class Mail**

Harry R. Steinmetz (3HS62)  
United States Environmental Protection Agency  
Region 3  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

RE: Safety Light Corporation Site  
Bloomsburg, Pennsylvania

Dear Mr. Steinmetz:

Enclosed are Oakland University's Responses to the United States Environmental Protection Agency's Information Requests in the above-referenced matter.

Please contact me if you have any questions or need any additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Boyd C. Farnam'.

Boyd C. Farnam  
Assistant General Counsel

BCF/ls  
Enc.

**OAKLAND UNIVERSITY'S RESPONSES TO THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY'S INFORMATION REQUESTS**

1. Describe in detail the business relationship between Oakland and Safety Light.

**Response:** Oakland University ("Oakland") has no records of any business relationship with Safety Light, and is not aware of any person(s) with knowledge of any such relationship.

2. Did Oakland ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite to the Site?

**Response:** Oakland has no records of transporting and/or brokering any hazardous substances and/or radioactive waste or other wastes for disposal or reclamation at the Site by US Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite, and is not aware of any person(s) with knowledge of any such activities.

3. If you answered "yes" to Question 2, please answer the following questions:

- a. Provide the name, current address (or most recent address available), telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.
- b. Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.
- c. For each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:
  - i. the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite);
  - ii. the type of hazardous substances, radioactive waste or other wastes that was disposed/reclaimed;
  - iii. the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;

- iv. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;
- v. all personal and internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite;
- vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at this Site.

**Response: Not applicable.**

4. Did Oakland ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite at the Site?

**Response: Oakland has no records of generating any radioactive wastes or other wastes that were disposed of or reclaimed by US Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site, and is not aware of any person(s) with knowledge of any such activities.**

5. If you answered "yes" to Question 4, please address the following issues:

- a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:

- i. the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;
- ii. the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;

- iii. the process(es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the process(es) that generated each;
  - iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and
  - v. the method of treatment and/or disposal of the above.
- b. Provide the names, titles, areas of responsibility, addresses and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:
- i. disposed of or treated radioactive or hazardous materials at the Site;
  - ii. arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and
  - iii. arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.
- c. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:
- i. the persons with whom you, or other such persons, made such arrangements;
  - ii. every date on which such arrangements took place;
  - iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state, (i.e. liquid, solid), and the process for which the substance was used or the process that generated the substance;
  - iv. the precise locations at which each material was disposed or treated at the Site;
  - v. the persons who selected the Site as the place at which materials were disposed or treated;

- vi. the final disposition of each material involved in such transactions;  
and
  - vii. the names of employees, officers, owners and agents for each transporter.
- d. For each and every instance in which you/your company arranged for disposal or treatment of material at the Site, identify:
- i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed or otherwise handled by you; and
  - ii. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, or dispose of materials at the Site.
- e. Provide the names, titles and areas of responsibility of any persons, including all Oakland employees, present and former, who are knowledgeable of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.
- f. Describe any permits or applications and any correspondence between Oakland and any regulatory agencies regarding materials transported to or disposed of at the Site.
- g. Provide copies of any correspondence between Oakland and any third party regarding materials transported or disposed of at the Site.
- h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who **arranged for the treatment, storage, disposal, or transportation** of such materials to the Site.
- i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.
- j. Provide the name, title, address and telephone number of the person answering these questions on behalf of the respondent.
- k. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of

the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

**Response: Not applicable.**

6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

**Response: Oakland is not aware of any person(s) who may be able to provide more detailed or complete responses to any of the Information Requests.**

7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.

**Response: Oakland is not aware of any information or documents which would be responsive to any of the Information Requests, but which are not in Oakland's possession, custody or control.**

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

**Response: Oakland is not aware of any party(ies) who may have information that would assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site.**

9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:

a. Your document retention policy.

- b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction.
- c. A description of the type of information that would have been contained in the documents.
- d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

**Response: Not applicable.**

Dated: 8/24/05

OAKLAND UNIVERSITY

By: Victor A. Zambardi

Victor A. Zambardi  
General Counsel and  
Secretary to the Board of Trustees and  
Freedom of Information Act Coordinator





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Office of the General Counsel  
and Secretary to the Board of Trustees

203 Wilson Hall  
Rochester, Michigan 48309-4401

Harry R. Steinmetz (3HS62)  
United States Environmental Protection  
Agency  
Region 3  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

FQABLMP 19103





Rochester, Michigan 48309-4401

To: Harry R. Steinmetz, SPADate: August 24, 2005Fax: (215) 814-3005From: Boyd C. Farnham / Jerry Phone: (248) 370-3110Fax: (248) 370-4474Re: Safety Light CorporationPages: 8 (including this page)

## THINK SUCCESS. THINK OAKLAND UNIVERSITY.

### FAST FACTS

#### FOUNDED 1957

#### ENROLLMENT 16,576

- 114 undergraduate programs
- 22 graduate degree and certificate programs

#### MAJOR NEW FACILITIES

- Education and Human Services Building
- University Student Apartments
- Parking Structure

#### WHAT'S NEW

- The Princeton Review included OU in its first edition of *The Best Midwestern Colleges*. Oakland also is considered one of the nation's most underrated schools in the 2004 edition of *The Unofficial Unbiased Guide to the 328 Most Interesting Colleges*.
- OU's Beaumont Graduate Program of Nurse Anesthesia is sixth in the United States in the 2004 edition of *U.S. News and World Report's America's Best Graduate Schools*.
- Oakland received a record \$12 million in grants and funding for research efforts across multiple disciplines in the 2002-03 academic year.
- OU has been instrumental in forming a new Oakland County Automation Alley SmartZone. The initiative combines the expertise and innovation of university researchers with the production of businesses and the tax support

of cities to expand existing technology labs and attract research companies

- OU's Golf and Learning Center will host the first Ryder Cup Champions Invitational on Thursday, September 16, 2004. In its exclusive state-by-state rankings, *Golf Digest* ranked OU's R & S Shaw Golf Course 21st among Michigan's 855 golf courses.
- Since moving to NCAA Division I in 1998, OU has won nine conference titles, 19 regular-season titles and sent 11 teams to post-season tournaments. The Mid-Con Conference named Ryan Rzepka, a defenseman for the men's soccer team, its 2002-03 Male Scholar-Athlete of the Year.



### PRIVACY NOTICE

This information contained in this transmission is private and confidential and may be privileged or exempt from disclosure under applicable federal or state law. It is intended only for the use of the above addressee. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone. Collect and return the original message to us at the above address via the U.S. Postal Service. Thank you.

Oakland University is an equal opportunity and affirmative action institution.



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Boyd C. Farnam  
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- iv. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;
- v. all personal and internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite;
- vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at this Site.

**Response: Not applicable.**

4. Did Oakland ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite at the Site?

**Response: Oakland has no records of generating any radioactive wastes or other wastes that were disposed of or reclaimed by US Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site, and is not aware of any person(s) with knowledge of any such activities.**

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- iii. the process(es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the process(es) that generated each;
  - iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and
  - v. the method of treatment and/or disposal of the above.
- b. Provide the names, titles, areas of responsibility, addresses and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:
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  - ii. every date on which such arrangements took place;
  - iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state, (i.e. liquid, solid), and the process for which the substance was used or the process that generated the substance;
  - iv. the precise locations at which each material was disposed or treated at the Site;
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- vi. the final disposition of each material involved in such transactions; and
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- d. For each and every instance in which you/your company arranged for disposal or treatment of material at the Site, identify:
- i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed or otherwise handled by you; and
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- f. Describe any permits or applications and any correspondence between Oakland and any regulatory agencies regarding materials transported to or disposed of at the Site.
- g. Provide copies of any correspondence between Oakland and any third party regarding materials transported or disposed of at the Site.
- h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.
- i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.
- j. Provide the name, title, address and telephone number of the person answering these questions on behalf of the respondent.
- k. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of

the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

**Response: Not applicable.**

If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

**Response: Oakland is not aware of any person(s) who may be able to provide more detailed or complete responses to any of the Information Requests.**

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**Response: Oakland is not aware of any information or documents which would be responsive to any of the Information Requests, but which are not in Oakland's possession, custody or control.**

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**Response: Oakland is not aware of any party(ies) who may have information that would assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site.**

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- c. A description of the type of information that would have been contained in the documents.
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**Response: Not applicable.**

Dated: 8/24/05

OAKLAND UNIVERSITY

By: Victor A. Zambardi

Victor A. Zambardi  
General Counsel and  
Secretary to the Board of Trustees and  
Freedom of Information Act Coordinator